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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

July 1, 2014

Jay Marshall, Resident Agent  
West Ridge Resources, Inc.  
P.O. Box 910  
East Carbon, Utah 84520-0910

Subject: 2013 Annual Report Review Completion, West Ridge Mine, C/007/0041, Task ID #4566

Dear Mr. Marshall:

The Division staff has completed the review of the 2013 Annual Report. Enclosed is a copy of the review with each reviewer's comments completed July 1, 2014.

Thank you for your diligence in completing the Annual Report. If you have any questions, please call me at (801) 538-5325.

Sincerely,

Daron R. Haddock  
Coal Program Manager

DRH/sqs  
Enclosure  
O:\007041.WR\WG4566\ReviewCompletionLetter.doc



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## Annual Report

This Annual Report shows information the Division has for your mine. Submit the completed document and any additional information identified in the Appendices to the Division by the date specified in the cover letter. During a complete inspection an inspector will check and verify the information.

### GENERAL INFORMATION

Company Name West Ridge Resources

Mine Name

West Ridge Mine

Permit Number C/007/0041

Permit expiration Date 2019-04-01

Operator Name Utah American Energy

Phone Number

+1 (435) 888-4000

Mailing Address PO Box 910

Email

dhibbs@coalsource.com

City East Carbon

State

UT

Zip Code

84520

### DOGM File Location or Annual Report Location

Excess Spoil Piles

☐ Required☒ Not Required

Refuse Piles

☐ Required☐ Not Required

Impoundments

☒ Required☐ Not Required

Sediment Pond Certification included

Other:

### OPERATOR COMMENTS

### REVIEWER COMMENTS

☐

Met Requirements

☒

Did Not meet Requirements

The permittee submitted the annual certified sediment pond inspection for 2013. This was taken for 2nd quarter of 2013. The permittee could have submitted the quarterly inspections to the Division on a quarterly bases as required by the R645 Coal Rules. (SJD)

## COMMITMENTS AND CONDITIONS

The Permittee is responsible for ensuring annual technical commitments in the Mining and Reclamation Plan and conditions accepted with the permit are completed throughout the year. The Division has identified these commitments below and has provided space for you to report what you have done during the past year for each commitment. If additional written response is required, it should be filed as an attachment to this report.

### Title: EXPERIMENTAL FIELD TRIALS

**Objective:** Monitoring to support proposed experimental practice. Provide a comparison of growth on field trials with Douglas/Fir reference area.

**Frequency:** Annual evaluation in June

**Status:** Ongoing

**Reports:** Provide in annual report

**Citation:** MRP, Volume 1, Appendix 2-6 and Volume A, Map 2-4

#### Operator Comments

The required report "Vegetation Monitoring at the Experimental Test Plot, 2013" prepared by Mt. Nebo Scientific is included.

Reviewer Comments ☒ Met Requirements ☐ Did Not Meet Requirements

The vegetation monitoring has been completed in accordance with the MRP.

The vegetation monitoring report begins on page 85 of the electronic annual report. Little has changed since the 2010 sampling. Total living cover is comparable between reference area and reclaimed plots. Differences in life form between reference area and reclaimed plots are to be expected, since no woody species were seeded or planted. As noted in last year's review of the annual report and in Task 3111 review (2009), a comparison of the Strych Stockpile plot and the Strych Fill plot is the test of the conventional technique versus the experimental technique in the same soil type. This experimental practice was reclaimed in 2005 and has been monitored for nine years. All plots meet or exceed expectations based upon the reference area comparison. I recommend that this vegetation monitoring be discontinued. (PWB, 6/30/2014)

### Title: SOIL SAMPLING OF FILL AT T1, T2 AND T3

**Objective:** To protect buried substitute topsoil in the fill. Collect a composite sample from several locations near each site to obtain a more average value.

**Frequency:** Annual evaluation during field season.

**Status:** Ongoing beginning in 2010.

**Reports:** Annual report

**Citation:** MRP, Volume 1, Appendix 2-6 addendum and Volume A, Map 2-4

#### Operator Comments

The required report "Soil Monitoring at the West Ridge Mine, 2013" prepared by Mt. Nebo Scientific is included.

Reviewer Comments



Met Requirements



Did Not Meet Requirements

The soil sampling information begins on page 69 of the electronic annual report. Laboratory analysis are provided in a table for comparison of sampling from 2001 to 2013. pH appears to be relatively constant, with the least standard deviation. between years and within years. The salt content as represented by EC and SAR is variable within site and between sites from year to year, likely due to snow and ice treatments on the roads. Sampling locations are shown on a map included with the soils report. A GPS locations has been reported for each sample location (T1, T2, T3) and an attempt to resample the same locations each year is being made. However this is not always possible. Thus the sample locations (T1, T2, T3) vary by several feet from year to year and this explains the variability as well. These locations of fill over native soil have shown no trend towards any acid formation and only the expected effects of salt accumulation from winter road treatments. Soil locations T1, T2, and T3 have been tested for 12 years and do not appear to be a source of hazard for the native topsoil buried below the fill. I recommend that this soil testing be discontinued. (PWB, 6/30/2014).

#### **Title: SUBSIDENCE MONITORING**

**Objective:** To monitor subsidence from longwall mining practices. Subsidence monitoring of panels until the effects of mining have stabilized and vertical movement is less than six inches per year.

**Frequency:** annual

**Status:** Ongoing

**Reports:** annual report

**Citation:** MRP, Volume 2, Chapter 5, page 5-23b to 5-23e

Operator Comments

Subsidence information is included.

Reviewer Comments



Met Requirements



Did Not Meet Requirements

Raw subsidence data was submitted with the annual report. The data showed that movement was observed ranging from 5.528 feet up upheaval to -5.986 feet of subsidence. These are likely outliers or anomalies. The average movement for the thousands of points measured is likely less than 1 foot. (JCO)

## FUTURE COMMITMENTS AND CONDITIONS

The following commitments are not required for the current annual report year, but will be required by the permittee in the future as indicated by the "status" field. These commitments are included for information only, and do not currently require action. If you feel that the commitment is no longer relevant or needs to be revised, please contact the Division.

<b>Title: RECLAMATION MONITORING</b>
<b>Objective:</b> Visually assess the revegetation success.
<b>Frequency:</b> Quarterly for the first three years and annually in June of each year thereafter
<b>Status:</b> Implement at reclamation
<b>Reports:</b> Annual Report
<b>Citation:</b> MRP, Volume 1, Chapter 3, page 3-16, paragraph 2
<b>Title: MEXICAN SPOTTED OWL SURVEY</b>
<b>Objective:</b> Conduct appropriate surveys for Mexican spotted owls on the lease tract areas with 40 percent or greater slopes, cliff habitat areas, riparian habitats, and mixed conifer forest habitats, prior to any future surface disturbing activity and/or any mining activity with the potential to interrupt surface spring flows. Inventory work must be conducted by parties approved and permitted for such survey work by the Fish and Wildlife Service and qualified in accordance with R645-301-132. Surveys must follow current protocol established by Fish and wildlife service.
<b>Frequency:</b> As needed
<b>Status:</b> ongoing
<b>Reports:</b> Annual
<b>Citation:</b> Permit condition attachment A, special condition #3.
<b>Title: SOIL SAMPLING OF FINAL GRADED FILL AT CATCHMENTS A, C AND E</b>
<b>Objective:</b> At final reclamation, the reclaimed surface soils of the catchments will be tested for pH, EC and SAR to allow for the evaluation of the salinity and the need for a revision or addition to the final seed mix to enhance germination and establishment.
<b>Frequency:</b> Once after final grading
<b>Status:</b> Future commitment
<b>Reports:</b> Provide information to the Division
<b>Citation:</b> MRP, Volume 2, Appendix 5-15, Attachment 9, page 14
<b>OPERATOR COMMENTS (OPTIONAL)</b>
<b>REVIEWER COMMENTS</b>

A raptor survey for 2013 is included in the annual report.

## REPORTING OF OTHER TECHNICAL DATA

Please list other technical data or information that was not included in the form above, but is required under the approved plan, which must be periodically submitted to the Division.

Please list attachments:

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Reviewer Comments

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# MAPS

Copies of mine maps, current and up-to-date, are to be provided to the Division as an attachment to this report in accordance with the requirements of R645-301-525.240. The map copies shall be made in accordance with 30 CFR 75.1200 as required by MSHA. Mine maps are not considered confidential.

Map Name	Map Number	Included		Confidential	
		Yes	No	Yes	No
Mine Map		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reviewer Comments ☒ Met Requirements ☐ Did Not Meet Requirements

The required mine map was included (JCO).